

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

**PROGRESSIVE HAWAII
INSURANCE CORPORATION,**

Plaintiff,

vs.

**NAKIA DAVIS, XAVIER BINGHAM,
RYAN WESTBROOK, ESTATE OF
JUSTIN WALKER,
JAMES A. RUSSELL, ANGELIC
HODGE, and
ALLSTATE INSURANCE COMPANY,**

Defendants.

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)
)
) **Civil Action No. 3:12-cv-00574**
)
)

MOTION FOR DEFAULT JUDGMENT

Comes now the Plaintiff, Progressive Hawaii Insurance Company, by and through counsel, and requests the Court, pursuant to Rule 55(b)(1) of the Federal Rules of Civil Procedure, for the entry of a judgment by default against the defendant, Nakia Davis. In support of this request, the Plaintiff relies upon the record in this case and the affidavit submitted herein.

Respectfully submitted,

TRAMMELL, ADKINS & WARD, P.C.

s/ Terrill L. Adkins
Terrill L. Adkins, BPR #013138
Attorney for Progressive
P.O. Box 51450
Knoxville, Tennessee 37950
865/330-2577

CERTIFICATE OF SERVICE

I hereby certify that on **April 26, 2013**, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the court's electronic filing system.

TRAMMELL, ADKINS & WARD, P.C.

s/ Terrill L. Adkins
Terrill L. Adkins